

September 2, 1988

Dear Manufacturer:

CD-88-14 (LD)

SUBJECT: EPA Response to Motor Vehicle Manufacturers
Association Regarding Guidance Letter CD-88-07

On August 19, 1988, EPA sent the enclosed response to the Motor Vehicle Manufacturers Association (MVMA), providing additional guidance on the use of side fans for certification and fuel economy tests. The response to the MVMA addressed several points that are of interest to all manufacturers including the implementation of this guidance in the 1990 model year and its application to highway tests.

Our guidance letter dated May 20, 1988 (CD-88-07) states that side fan cooling will no longer be automatically allowed for FTP testing beginning with the 1990 model year. However, manufacturers commented that some early 1990 model year certification programs are already under way. Therefore, given the lead time required to obtain the necessary data to demonstrate the need for a side fan, EPA is delaying implementation of the guidance on side fan use until the 1991 model year.

Another question raised by the MVMA was the guidance letter's application to highway testing. As explained in the enclosed letter, the guidance letter does not apply to highway tests and EPA's current practice of always using side fan cooling for highway tests (unless the manufacturer requests that it not be used) remains in effect.

The enclosed letter also responds to the MVMA regarding use of the side fan during preconditioning cycles and durability testing.

Finally, as requested in the letter to the MVMA, EPA requests that manufacturers provide a list of issues or questions related to the side fan guidance for discussion at a possible workshop.

Sincerely,

Robert E. Maxwell, Director
Certification Division
Office of Mobile Sources

Enclosure

August 19, 1988

Mr. Marcel Halberstadt, Director
Environmental Engineering Department
Motor Vehicle Manufacturers Association
300 New Center Building
Detroit, Michigan 48202

Dear Mr. Halberstadt:

This is in response to your letter of July 19, 1988 commenting on the Certification Division guidance letter CD-88-07, dated May 20, 1988, which provides guidance on the use of side fan cooling for certification and fuel economy testing.

You expressed-concern on behalf of your members about implementing these guidelines beginning with the 1990 model year. When we established the 1990 model year as the implementation date, we did not realize the extent of many manufacturers' 1990 - model year advance certification efforts. In consideration of this as it relates to lead time needed to develop data comparing certification test cooling to on-road cooling, we will delay implementation of this decision until the 1991 model year.

It is possible at this point to clarify several other matters raised in your letter. You were correct in your understanding that the guidance on side fan cooling also applies to the preconditioning cycle. The same cooling fan usage and configuration is expected to be used for both the preconditioning cycle and the emissions test on the Federal Test Procedure (FTP). Side fan cooling on the highway test was not addressed by the guidance letter because our current practice of always using a side fan for the highway test (unless the manufacturer requests not to use it) remains in effect. The decision to not use FTP side fans without justification was prompted by emissions concerns. As yet we have no concerns about side fans on the highway test because it does not effect emissions compliance. Finally, our guidance was not intended to impact durability testing. However, all durability emission tests on a given durability data vehicle should be run using the same cooling fan arrangement so the deterioration factor is not affected. In the future, all durability emission testing

should be consistent with the corresponding emission-data testing. However, we would not preclude the use of carryover of durability data solely on the basis of inconsistency of side fan usage between the durability testing and subsequent model year emission data testing.

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We do not agree that the issue of side fan cooling should be delayed for resolution in the future rulemaking proceedings. Our new guidance on side fan cooling is consistent with current regulations (at 40 CFR 86.135(b)).

We appreciate your interest in developing a workshop on side fan cooling. Our decision to have a workshop will depend on the number and type of topics to be discussed. It may be more expeditious to resolve a small number of issues in individual or small group meetings. To help us determine the best course of action, please provide a list of issues or problems that you believe need resolution, as well as, your suggestions for an agenda for a possible workshop.

Sincerely,

Robert E. Maxwell, Director
Certification Division
Office of Mobile Sources